



OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE

Marc Elrich
County Executive

Tiffany Ward
Director and Chief Equity Officer

MEMORANDUM

February 13, 2023

To: Jennifer Bryant, Director
Office of Management and Budget

From: Tiffany Ward, Director
Office of Racial Equity and Social Justice 

Re: Racial Equity Impact Assessment (REIA) Supplemental Appropriation (SA) #23-57 –
Amendment to the FY23-28 Capital Improvements Program for Apparatus
Replacement Program

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that Supplemental Appropriation #23-57 – *Amendment to the FY23-28 Capital Improvements Program for Apparatus Replacement Program* – is unlikely to advance racial equity and social justice in Montgomery County as there is no evidence that the existing Capital Improvement Program (CIP) project No. 451504 will utilize a process for the distribution of fire apparatus and Emergency Medical Service (EMS) vehicles that considers racial and other disproportionalities in fire and emergency medical risk.

Information accompanying this supplemental request states that apparatus replacement decisions are based, in part, on call (incident) load, indicating that busier fire stations are more likely to be prioritized in the distribution of fire apparatus and EMS units. A statement – made without the addition of supplemental data to substantiate the claim – that busier fire stations serve a greater proportion of communities identified as Black, Indigenous, or People of Color (BIPOC) suggests that as such, fire stations primarily serving these communities would be prioritized in resource distribution. The absence of data makes it difficult to assess the validity of this claim in addition to a lack of transparency regarding the full methodology regarding policies or processes used to determine resource distribution. Of note, while the partial methodology offered fails to adequately address disparities based on race and ethnicity, it also omits additional considerations such as income, gender, location, and age—variables that correlate to higher instances of fire and emergency medical risk.

II. **BACKGROUND:** The purpose of Supplemental Appropriation #23-57 – *Amendment to the FY23-28 Capital Improvements Program for Apparatus Replacement Program* – is to provide for the ongoing replacement of fire apparatus and EMS vehicles which includes enhanced safety features as well as decreased downtime for maintenance and repairs.¹ The onset of supply chain issues as well as historic inflation due in large part to the COVID-19 Pandemic has – like many other industries – impacted the fire apparatus industry, resulting in significant cost increases for goods. Additionally, research into an expressed interest in both electric fire apparatus as well as idle reduction technology has revealed significant cost increases should the County choose to invest in these green alternatives. Also of note, while fire apparatus has been traditionally delivered to the County within 10 to 14 months of the date of order, delivery times have now been extended to 24 to 36 months. As such, advance appropriation of approved funding will allow the County to encumber funds for vehicles with long lead times as well as to minimize cost increases through early orders.

III. **ANALYSIS OF CIP PROJECTS THROUGH THE LENS OF RACE EQUITY:** ORESJ has previously documented the importance of utilizing a racial equity lens regarding distribution and policy as a way to address racial and other inequities shaping fire safety risk (and other emergency health outcomes) in the County. Our analysis can be found in the following Racial Equity Impact Assessments (REIAs):

1. REIA of Supplemental Appropriation #22-69 Senator Amoss Fire and Rescue Services Grant
<https://www.montgomerycountymd.gov/ore/Resources/Files/22-69.pdf>
2. REIA of Supplemental Appropriation # #22-87 Heart Monitor/Defibrillator Replacement <https://www.montgomerycountymd.gov/ore/Resources/Files/22-87.pdf>

Additionally, ORESJ developed a Capital Improvements Program Budget Equity Tool (CIP BET) and Guidance Manual² to help stakeholders in Montgomery County incorporate a racial equity lens into CIP project development and resource decisions. Best practices for using a racial equity tool, such as the CIP BET, suggest that the tool should be used early and often in project development and involve a diverse set of project stakeholders—including community members and intended beneficiaries of the program.

During the FY23-28 CIP budget submission cycle, Montgomery County Fire and Rescue Service (MCFRS) stated in their CIP BET response for CIP project No. 451504 “*Yes, this project aligns with the county’s policy to reduce and eliminate racial disparities and inequities*”. This response was not accompanied by any substantive evidence to support this claim, with the remaining CIP BET response stating, “*I am answering in this box for 'Yes' as FRS apparatus replacement reflects all population of Montgomery County*”, with “*FRS [having] attended a briefing*

¹ Montgomery County, MD Capital Budget. *Apparatus Replacement Program*. 2023. Available at: <https://apps.montgomerycountymd.gov/BASISCAPITAL/Common/Project.aspx?ID=P451504>

² The Office of Racial Equity and Social Justice. *Guidance Manual: FY24 Capital Improvements Program Budget Equity Tool*. 2022. Available at: https://www.montgomerycountymd.gov/ORE/Resources/Files/CIP_EquityTool_101322_PS2.pdf

[regarding] racial equity and this project for the FY23-28 cycle”. Much like the CIP BET response, this supplemental appropriation request does not propose substantive changes to the project that would address racial and other inequities related to disproportionate fire and emergency medical risk—instead taking a more race-neutral approach. While there may be limited opportunities to identify project changes that may support the reduction of racial disparities and inequities within the project – as these were not considered during the design – using ORESJ’s CIP BET as a framework, we offer several observations for consideration:

What racial disparities or inequities in Montgomery County does this project seek to reduce or eliminate?

As previously stated in the program’s response to the FY23 CIP BET, this project does not seek to address a specific racial disparity or inequity in the County but will instead benefit *all* County residents. Specifically, CIP project No. 451504 is intended to provide a steady and continuous flow of funding for minimum apparatus replacement needs in alignment with requirements of the *Commission on Fire Accreditation International* and the *NFPA 1901 Standard for Automotive Fire Apparatus* recommendation that “fire departments seriously consider the value (or risk) to firefighters of keeping fire apparatus older than 15 years in first-line service”.³ Additionally, regular apparatus replacement is identified in the current *Fire, Rescue, Emergency Medical Services, and Community Risk Reduction Master Plan*⁴, as approved by the County Council.

How does this project address the racial disparities and inequities you described?

Addressing racial disparities and inequities is not identified as a core tenet of the funding request. However, the MCFRS vision statement and guiding principles articulate a commitment to enhancing public safety and supporting quality of life through direct immersion in the community while recognizing the importance of diversity in these communities.⁵ Such an acknowledgment should necessitate the distribution of resources and services in a culturally responsive manner, reflective of the diverse communities MCFRS serves. Current and historical data suggest that not all experience or equitably benefit from FRS. As disaggregated data related to fire deaths in the County is not readily available, national statistics find that Black people experience a disproportionate percentage of fire deaths (40%) in the United States compared to the general population.⁶

³ Montgomery County, MD Capital Budget. *Apparatus Replacement Program*. 2023. Available at: <https://apps.montgomerycountymd.gov/BASISCAPITAL/Common/Project.aspx?ID=P451504>

⁴ Montgomery County Council. *2016-2022 Fire, Rescue, Emergency Medical Services, And Community Risk Reduction Master Plan*. 2016. Available at: https://www.montgomerycountymd.gov/MCFRS/Resources/Files/MasterPlan/2016_2022_MCFRS_Master_Plan_Final_Approved.pdf

⁵ Montgomery County, Maryland Fire & Rescue Service. 2023. Available at: <https://www.montgomerycountymd.gov/mcfrs/about/index.html>

⁶ US Federal Emergency Management Agency. *Topical Fire Report Series*. September 2019. Volume 20, Issue 3. Available at: <https://www.usfa.fema.gov/downloads/pdf/statistics/v20i3.pdf>

Additionally, Black residents are at greater risk of experiencing heart disease mortality when compared to other racial and ethnic groups⁷, which would suggest that in many emergency situations, MCFRS is responding to the consequence of health inequity. With these statistics in mind, the application of a race equity lens to this funding request could serve to mitigate these disparities in outcomes.

Does this project (including its development, construction, or implementation) have the potential to create any unintended consequences?

MCFRS responses do not identify any potential consequences as a result of funding this supplemental request, instead insisting that CIP project No. 451504 benefits all County residents and MCFRS employees. In this instance, ORESJ would suggest the use of a “Targeted Universalist” approach in which universal goals are established for all groups concerned, however, the strategies developed to achieve those goals are targeted, based on how different groups are situated within structures, culture, and across geographies to obtain the universal goal.⁸ To achieve this aim, ORESJ recommends MCFRS consider areas of greatest need in the County – such as communities at greatest fire or emergency medical risk and communities that experience longer FRS and EMS response times – to assess whether a supplemental appropriation such as this may advance equitable outcomes in the County or exacerbate inequities. While MCFRS may not necessarily be positioned to address the root causes of inequities, it can plan for and distribute assistance in ways that help to reduce negative outcomes resulting from those inequities.

cc: Scot Goldstein, Fire Chief, Fire and Rescue Services
Ken Hartman, Director, Strategic Partnership, Office of the County Executive

⁷ Jupiter Independent research group. *Racial Equity Profile Montgomery County*. 2019.

<https://www.montgomerycountymd.gov/OLO/Resources/Files/2019%20Reports/RevisedOLO2019-7.pdf>

⁸ powell, j., Menendian, S. & Ake, W. *Targeted Universalism Policy & Practice*. 2019. Available at:

<https://belonging.berkeley.edu/targeted-universalism>